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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

3:21-cr-00 413-HZ

v.

INDICTMENT

THOMAS EDWARD GREEN III and

18 U.S.C. § 922(a)(6)

EDWARD CHARLES GREEN,

Forfeiture Allegation

Defendants.

THE GRAND JURY CHARGES:

COUNTS 1 - 41 (False Statement During Purchase of a Firearm) (18 U.S.C. § 922(a)(6)

On or about the dates listed below, in the District of Oregon, each defendant set forth below, in connection with the acquisition of the firearms set forth below, from a Federally Licensed Firearms Dealer (FLFD), of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious statement to the FLFD listed below, which statement was intended and likely to deceive the FLFD as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, to wit: the defendant represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms,

and Explosives form 4473, Firearms Transaction Record, that he was the actual buyer of the firearm when, he knew he was in fact not;

Count	Defendant	Date	Firearm Dealer	Firearms(s)
1	Thomas Edward Green III	May 6, 2020	FLFD No. 1	Glock 17, .9mm PistolTaurus PT 101 AF, .40 caliber pistol
2.	Thomas Edward Green III	May 12, 2020	FLFD No. 1	 Century Arms Draco, .9mm Pistol Glock 22, .40 caliber pistol
3	Thomas Edward Green III	January 16, 2020	FLFD No. 1	• Two Glock 23, .40 caliber pistols
4	Thomas Edward Green III	June 23, 2020	FLFD No. 1	 Glock 23, .40 caliber pistol Glock 23, .40 caliber pistol Glock 22, .40 caliber pistol
5	Thomas Edward Green III	June 23, 2020	FLFD No. 2	 HS Produkt XDE, .45 caliber pistol Bersa TPR45C, .45 caliber pistol
6	Thomas Edward Green III	July 10, 2020	FLFD No. 1	• Two Glock 22, .40 caliber pistols
7	Thomas Edward Green III	July 12, 2020	FLFD No. 1	• Two Glock 22, .40 caliber pistols
8	Thomas Edward Green III	July 17, 2020	FLFD No. 1	 Glock 21, .45 caliber pistol Glock 22, .40 caliber pistol
9	Thomas Edward Green III	September 4, 2021	FLFD No. 1	Glock 43, .9mm pistolGlock 39, .45 caliber Pistol
10	Edward Charles Green	April 1, 2020	FLFD No. 3	• Taurus G3, .9mm pistol
11	Edward Charles Green	April 10, 2020	FLFD No. 1	Smith and Wesson M&P 40, .40 caliber pistol
12	Edward Charles Green	April 10, 2020	FLFD No. 1	• Glock 23, .40 caliber pistol
13	Edward Charles Green	April 14, 2020	FLFD No. 1	• Smith and Wesson SDV9VE, .9mm pistol
14	Edward Charles Green	April 15, 2020	FLFD No. 2	Glock 30, .45 caliber pistol

15	Edward Charles Green	April 20,2020	FLFD No. 4	Glock 17, .9mm pistol
16	Edward Charles Green	April 21, 2020	FLFD No. 1	• Glock 21, .45 caliber pistol
17	Edward Charles Green	April 23, 2020	FLFD No. 1	 Stoeger Cougar, .9mm pistol Taurus G2C, .9mm pistol Pioneer arms, hell pup, 7.62 x 39 pistol
18	Edward Charles Green	May 18, 2020	FLFD No. 5	• Glock 43x, .9mm pistol
19	Edward Charles Green	May 29, 2020	FLFD No. 1	Glock 22, .40 caliber pistol
20	Edward Charles Green	June 5, 2020	FLFD No. 1	Glock 21, .45 caliber pistol
21	Edward Charles Green	June 9, 2020	FLFD No. 1	Glock 21, .45 caliber pistol
22	Edward Charles Green	June 20, 2020	FLFD No. 1	Dickinson Combo AK212, 12-gauge shotgun
23	Edward Charles Green	August 13, 2020	FLFD No. 1	Two Glock 31, .357 pistols
24	Edward Charles Green	October 20, 2020	FLFD No. 1	Glock 22, .40 caliber pistol
25	Edward Charles Green	November 10, 2020	FLFD No. 1	Glock 22, .40 caliber pistol
26	Edward Charles Green	December 8, 2020	FLFD No. 1	 Glock 21, .45 caliber pistol Glock 23, .40 caliber pistol
27	Edward Charles Green	December 14, 2020	FLFD No. 1	Glock 22, .40 caliber pistol
28	Edward Charles Green	February 25, 2021	FLFD No. 1	Rossi M711, .357 caliber pistol
29	Edward Charles Green	March 6, 2021	FLFD No. 1	 Glock 23, .40 caliber pistol Baretta APX, .9mm Pistol
30	Edward Charles Green	July 21, 2021	FLFD No. 6	 Tisas Zigana PX-9, .9mm pistol Taurus PT809, .9mm pistol
31	Edward Charles Green	July 21, 2021	FLFD No. 7	Taurus G3C, .9mm pistol
32	Edward Charles Green	July 22, 2021	FLFD No. 8	Stoeger STR-9C, .9mm pistol

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				 SCCY CPX-2, .9mm pistol Star BM, .9mm pistol Stoeger STR-9, .9mm pistol
33	Edward Charles Green	July 27, 2021	FLFD No. 1	 Smith and Wesson SW9VE, .9mm pistol Glock 17, .9mm pistol Glock 22, .40 caliber pistol
34	Edward Charles Green	July 27, 2021	FLFD No. 8	 Smith and Wesson MP40 Shield, .40 caliber pistol Taurus PT111 G2, .9mm pistol
35	Edward Charles Green	July 28, 2021	FLFD No. 1	 Two Glock 22, .40 caliber pistols Taurus PT111G2, .9mm pistol Taurus PT111PRO, .9mm pistol Springfield XDE, .9mm pistol SCCYCPY-ITTSGRD, .9mm pistol Taurus PT24/7PRO, .45 caliber pistol
36	Edward Charles Green	August 4, 2021	FLFD No. 1	 Ruger EC9S, .9mm pistol Four Glock 22, .40 caliber pistols
37	Edward Charles Green	August 9, 2021	FLFD No. 9	• Ruger 57, 57x2 caliber pistol
38	Edward Charles Green	August 9, 2021	FLFD No. 9	 Two High-Point C9, .9mm pistols Hi-Point JHP 45, .45 caliber pistol Clerke Clerke 1st, .32 caliber revolver
39	Edward Charles Green	August 9, 2021	FLFD No. 1	 Walther CCP, .9mm pistol Smith and Wesson 637, .38 caliber revolver Beretta BU9 Nano, .9mm pistol

				•	Three Glock 22, .40 caliber pistols
40	Edward Charles Green	September 11, 2021	FLFD No. 1	•	Two Glock 22, .40
	Daward Charles Groom	Beptemeer 11, 2021	7272710.1		caliber pistols
41	Edward Charles Green	September 15, 2021	FLFD No. 1	•	Two Glock 22, .40
					caliber pistols

In violation of Title 18, United States Code, Section 922(a)(6).

FORFEITURE ALLEGATION

Upon conviction of one or more offenses alleged in Counts 1 through 41, the defendants THOMAS EDWARD GREEN III and EDWARD CHARLES GREEN shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms involved in or used in the commission of the offense.

Dated: October 21, 2021

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG Acting United States Attorney

PARAKRAM SINGH, OSB#134871 Assistant United States Attorney